

Edward A. Keane*

Cornelius A. Mahoney

Garth S. Wolfson*

Jorge A. Rodriguez

Of Counsel

Stephen J. Murray

*Also admitted in NJ

†Also admitted in CT

Case 1:07-cv-11110-HB Document 4 Filed 02/05/2008
Atorneys at Law
111 Broadway, Tenth Floor
New York, New York 10006
Telephone (212) 385-1422
Facsimile (212) 385-1605
lawoffices@mahoneykeane.com

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 12345678
DATE FILED: 2/7/08

Connecticut Office

Page 1 of 2

14 Pilgrim Lane

Weston, CT 06883

Tel: (203) 222-1019

Fax: (203) 222-0252

RECEIVED
FEB 11 2008
U.S. DISTRICT COURT
S.D.N.Y.

February 1, 2008

THIS TRANSMISSION CONSISTS OF
VIA FAX (212) 805-7901

four

(4) PAGE(S)

THE HONORABLE HAROLD BAER, JR.
UNITED STATES COURTHOUSE
SOUTHERN DISTRICT OF NEW YORK
500 Pearl Street
New York, NY 10007

Re: MEDITERRANEAN SHIPPING CO., et al. v. ALL
AMERICAN PRODUCE CORP.
USDC/SDNY -- Civ. No. 07-11110
File No. 12/3507

Honorable Sir:

We represent Plaintiffs MEDITERRANEAN SHIPPING CO. S.A. and MEDITERRANEAN SHIPPING CO. (USA), INC. (collectively "MSC") in the above-stated matter. Our records show that there is a conference scheduled for February 7, 2008. However, our process server has informed us that they were only able to serve Defendant with the pleadings on January 25, 2008. As of today, we have not been contacted by Defendant or their counsel. Given that Defendant's time to answer has not expired, and that they likely have not had time to retain counsel to represent them in this matter, we ask that the preliminary conference be adjourned to March 7, 2008.

2/7/08

March 6, 2008 is adjourned
(conference day) will adjourn
to that date at 2:30 PM
SACRED
Harold Baer
J.S.D.

Respectfully submitted,
MAHONEY & KEANE LLP



Jorge A. Rodriguez, Esq.

CC: ALL AMERICAN PRODUCE CORP. (with enclosures)
426 S.W. 8th Street, #8
Miami, FL 33130